UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED FOOD AND COMMERCIAL WORKERS UNIONS AND EMPLOYERS MIDWEST HEALTH BENEFITS FUND, on behalf of itself and all others similarly situated.

Plaintiff,

VS.

FOUGERA PHARMACEUTICALS, INC., HI-TECH PHARMACAL CO., INC., PERRIGO COMPANY PLC, SANDOZ, INC., TARO PHARMACEUTICAL INDUSTRIES, LTD., TARO PHARMACEUTICALS USA, INC., and WOCKHARDT USA LLC,

Defendants.

Case No. 1:16-cv-07979-WHP

RULE 7.1 DISCLOSURE STATEMENT OF SANDOZ INC.

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned attorneys of record for defendant Sandoz Inc. ("Sandoz") state that Sandoz is an indirect, wholly owned subsidiary of Novartis AG, a publicly held company, the shares of which are traded on the SIX Swiss Exchange under the ticker symbol NOVN and whose American Depository Shares are publicly traded on the New York Stock Exchange under the ticker symbol NVS. There are no publicly traded companies between Sandoz and Novartis AG.

Dated: New York, New York November 21, 2016

/s/ Saul P. Morgenstern

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